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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TROY A. GARCIA,

Plaintiff,

v.

SPECIALIZED LOAN SERVICING LLC;
AMERICAN HONDA FINANCE CORP.;
TOYOTA FINANCIAL SERVICES; WELLS
FARGO CARD SERVICES; EQUIFAX
INFORMATION SERVICES, LLC,

Defendants.

Case No.: 2:17-cv-01721-RFB-VCF

**STIPULATION FOR EXTENSION OF
TIME**

SECOND REQUEST

Pursuant to LR 6-1 and LR 26-4, Plaintiff Troy A. Garcia ("Plaintiff"), and Defendant Specialized Loan Servicing, LLC ("SLS"), by and through their respective counsel of record, hereby stipulate and request that this Court extend the dispositive motion deadline and deadline to file pre-trial order, by thirty (30) days. At this time, the parties are not seeking an extension of any other discovery deadlines but reserve the right to request in the future. In support of this Stipulation and Request, the parties state as follows:

A. DISCOVERY COMPLETED TO DATE

Presently, the active parties to this case are Plaintiff and Specialized Loan Servicing, LLC ("SLS"), and as such, the recitation of discovery shall be with respect to Plaintiff and SLS.

On October 6, 2017 Plaintiff served his initial disclosures;

On October 27, 2017 SLS served its initial disclosures;

On November 17, 2017 Plaintiff served his First Supplemental Disclosures;

On January 30, 2018 SLS served Request for Admissions, Request for Production of Documents and Interrogatories on Plaintiff;

On January 31, 2018 Plaintiff served Request for Admissions, Request for Production and Interrogatories of Documents on SLS;

On March 1, 2018 SLS served responses to Request for Admissions, Request for Production of Documents and Interrogatories, and Supplemental Disclosures;

On March 5, 2018 Plaintiff served responses to Request for Admissions, Request for Production of Documents and Interrogatories and Second and Third Supplemental Disclosures.

On March, 5, 2018 Plaintiff completed the 30(b)(6) deposition of SLS.

On March 9, 2018 SLS completed the deposition of Plaintiff.

Specific Description of Discovery that Remains to be Completed

1. No additional discovery is needed. However, the parties did not receive all transcripts from the depositions completed in early March 2018 until late March 2018 and the deadline for deponents to note any revisions to their depositions has not expired, preventing preparation of dispositive motions. Additionally, a motion to dismiss Plaintiff's complaint remains pending before the Court.

C. Reasons Why the Remaining Discovery Was Not Completed

The parties aver, pursuant to LR 6-1 and LR 26-4, that good cause exists for the requested extension. At this juncture, discovery has closed in this matter. The parties previously stipulated to extend pretrial deadlines to allow the completion of discovery. While the parties specifically requested accelerated delivery of the deposition transcript and had anticipated having the deposition transcripts with adequate time to prepare and submit dispositive motions, the transcripts were not delivered as early as anticipated. The requested extension of the dispositive motion deadline is to permit review of final deposition transcripts and prepare appropriate dispositive motions. The parties are bringing this request now because they did not know at least

twenty-one (21) days prior to the pending dispositive motion deadline that the deposition transcripts would be delayed in delivery and if the Court would enter a ruling prior to the current dispositive motion deadline.

In order to have the necessary time to review the deposition transcripts and prepare dispositive motions, the parties request a thirty (30) day extension of the dispositive motion deadline, as well as the deadline to file a pre-trial order. This is their first request to extend the deadline to file dispositive motions and a pre-trial order.

D. Proposed Discovery Deadlines

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	Expired	Same
Deadline to Amend Pleadings	Expired	Same
Deadline to Disclose Initial Experts	Expired	Same
Deadline to Disclose Rebuttal Experts	Expired	Same
Dispositive Motions	April 4, 2018	May 4, 2018
Pre-Trial Order	May 4, 2018	June 4, 2018 ¹

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¹ 30 days (June 3, 2018) is a Sunday.

1 **IT IS SO STIPULATED.**

2 DATED this 2nd day of April, 2018.

 DATED this 2nd day of April, 2018

3 GREENBERG TRAURIG, LLP

 KNEPPER & CLARK LLC

4
5 /s/ Michael Hogue

/s/ Miles Clark

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15 **SCHEDULING ORDER**

16 The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this
17 action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

18 IT IS SO ORDERED

19 
20 _____

21 United States Magistrate Judge

22 Dated: 4-3-2018
23 _____

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), 45, I hereby certify that on April 2, 2018, a copy of the foregoing **STIPULATION FOR EXTENSION OF TIME (SECOND REQUEST)** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF filing system, and parties may access this filing through the Court's CM/ECF system.

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